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VLADECK, RASKIN & CLARK, P.C.

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## VIA ECF

The parties' application for a stay of discovery pending private mediation is DENIED. The parties' application to cancel the Court-The Honorable Lorna G. Schofield ordered mediation is GRANTED. The Court-ordered mediation is CANCELLED.

**United States District Court** 

40 Foley Square

New York, New York 10007

Dated: August 19, 2021 New York, New York

UNITED STATES DISTRICT JUDGE

Re: Kastrati v. M.E.G. Restaurant Enterprises, et al., 21-CV-00481(LGS)

Dear Judge Schofield:

We represent plaintiff Mike Kastrati ("Kastrati" or "plaintiff") in the above-captioned action against Marco Fregonese ("Fregonese"), Elizabeth Yoshida ("Yoshida") (collectively, "individual defendants"), and M.E.G. Restaurant Enterprises Ltd. d/b/a Novita ("Novita") (collectively, "defendants"). We write on behalf of the parties to notify the Court that parties have agreed to conduct a private mediation and to respectfully request (1) a stay of discovery deadlines (Dkt. 40); and (2) that the Court-ordered mediation be cancelled (Dkt. 45).

The parties have agreed to conduct a private mediation, scheduled to take place on September 9, 2021 at JAMS with Carol Wittenberg. The parties wish to preserve resources in order to facilitate the settlement process. Accordingly, we respectfully request that discovery be stayed until September 16, 2021 so that the parties can engage in mediation. The parties also propose that if they are unable to resolve this matter after the mediation, discovery would resume as of September 16, 2021 and continue until October 29, 2021, during which time the parties would conduct depositions and raise any unresolved discovery disputes with the Court. In addition, given that the parties have agreed to a private mediation, they respectfully ask that the Court-ordered mediation be cancelled.

Respectfully submitted,

/s/

Jeremiah Iadevaia

cc: Counsel of record (via email and ECF)

LORNA G. SCHOFIELD United States District Judge